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VIA UNITED PARCEL OVER NIGHT SERVICE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Implementation of Sections of
the Cable Television Consumer
Protection and Competition Act

Rate Regulation

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MM Docket 92-266

REPLY TO OPPOSITIONS TO PETITIONS FOR RECONSIDERATION

Televista Communications, Inc.

Michael E. Turner
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July 29, 1993

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REPLY TO OPPOSITIONS TO PETITIONS FOR RECONSIDERATION

This pleading is filed by Televista Communications, Inc. to submit to the Commission important information regarding the statistical insufficiency of the FCC Cable TV Rate Survey Database and the inapplicability of FCC Competitive Cable TV Rate Benchmarks to rural cable systems.

Televista Communications is a small family owned cable operator serving exclusively rural areas, with housing densities of approximately 30 homes per plant mile. Our two systems, Televista Communications and North Oakland Cablevision ("Televista Systems") together serve 6100 customers. We serve areas that the large MSO's

Televista's analysis excluded data for systems where the FCC Cable TV Rate Survey Database did not reflect the numbers of Homes Passed, Homes Subscribing, or Plant Miles, as those three variables are essential to housing and subscriber density analysis.

Televista's analysis divided the FCC Rate Database into three housing density groups:

- 1) Systems of All Densities (including both high and low density systems)
- 2) Systems of Less than 40 Homes Per Mile
- 3) Systems of Less Than 30 Homes Per Mile

The analysis then looked at each of those housing density groups relative to types of competition shown in the FCC Rate Database.

This discussion will focus on Competition Types B and C, as most rural systems have penetration rates exceeding the 30% level that evidences Type A Competition.

Televista's analysis disclosed that systems of less than 40 homes per mile are statistically under-represented in the FCC Rate Database for all Competition Types.

In the FCC Database:

- 1) In systems with Type A Competition, the average density is 98 homes per plant mile; in systems with Type B Competition, the average density is 64 homes per plant mile; and, in systems with Type C Competition, the average density is 62 homes per plant mile.
- 2) Type B or C Competition exist in a total of 53 systems, of all housing densities, (serving 847,364 homes -- 16.23% of the homes in the FCC Rate Database). This represents more than 1 out of every 6 homes in the FCC Rate Database.
- 3) 15.5% of all homes are in cable systems with housing densities of less than 40 homes per plant mile. This is also more than 1 out of every 6 homes in the FCC Rate Database.
- 4) However, where housing density is less than 40 homes per plant mile, Type B or C Competition exist in only 7 small

- 5) Moreover, where housing density is less than 30 homes per plant mile, Type B or C Competition exist in only 2 small systems (serving 9,028 total homes -- 17/100 of 1% of the homes in the FCC Rate Database). This represents less than 1 out of every 550 homes in the FCC Rate Database.

This all boils down to a self evident fact: Cable companies, MMDS providers, or Franchise Authorities almost never compete with cable systems in rural areas -- there are simply not enough homes in rural areas to support two competing systems.

The hard fact is, in rural areas, it is extremely difficult for even one company to cover its construction and operating costs, let alone for two companies to do so while effectively splitting the sparse subscriber base.

In such rural areas, the costs per subscriber are much higher than the costs per subscriber in areas of average density. It costs the same amount to build, power, and maintain a mile of cable whether 30 homes or 60 homes are passed in that mile. But in rural areas, those same costs must be spread over half (or fewer) the subscribers per mile.

Enclosed, as Attachment B is an analysis by Arthur Andersen & Co., quantifying the additional construction cost per subscriber in systems of low subscriber density. The Arthur Andersen study demonstrates that systems with subscriber density of 15 subscribers per mile, have costs over a 12 year period of \$4.19 per month, per subscriber, greater than systems of average subscriber density.

This demonstrates that systems such as the Televista Systems, with subscriber density of approximately 16 per mile, must generate revenues of almost \$4.00 more than the average cable system, simply to cover the cost of building the system.

Operational costs of small and rural systems also exceed industry averages. For example, programming costs, at rate card, are far higher for small systems, including the Televista Systems, than for large systems, which receive substantial discounts from rate card prices.

Personnel, vehicle, and fuel costs are also much higher for rural systems than for dense systems, as personnel and equipment must travel much farther to service cable customers.

Small companies, including the Televista Systems, also are administratively and technically much more expensive to run than large systems, as costs such as legal, accounting, bookkeeping and administrative and technical supervision costs must be spread over a much smaller subscriber base.

The failure of the FCC Rate Benchmark formulae to differentiate between cable operators serving areas of average subscriber and housing densities versus those serving areas of low subscriber and housing densities, as well as the failure to differentiate between large companies and small companies, renders application of the Benchmark Rates to systems of less than 40 homes per plant mile, and to small systems, arbitrary and capricious.

Under the FCC Benchmark formulae, many small systems, including the Televista Systems, would be required to roll rates back. Such rate rollbacks cannot be sustained by the Televista Systems, or other small systems serving exclusively rural areas.

Under the FCC Benchmark Rates, the two Televista Systems would suffer revenue reductions of over \$195,000 per year. Such rollbacks would put the Televista systems in violation of bank covenants, and without substantial infusions of capital would make it impossible for the Systems to service debt.

Moreover, as the benchmark formulae require franchise by franchise analyses, many companies, including the Televista Systems, would actually end up with different rates for each Franchise -- in Televista's case six different franchises, each covering between 400 and 1500 subscribers.

As it now stands, because the Benchmark rates do not cover costs, many small companies, including the Televista Systems, are forced to proceed on a Cost of Service basis. However, the cost of service approach is extremely uncertain and burdensome.

First, a company must compile data and present Cost of Service proofs for the basic tier to each of the franchise jurisdictions it serves. Each cost of service showing will be different, and require separate preparation, as each franchise jurisdiction will have slightly different plant characteristics and costs.

Second, the company must make related showings to the FCC for the satellite tier -- again each one different and requiring separate preparation and proofs.

Finally, companies do not know what the Cost of Service process will be like, as the FCC has not yet released the Rules. The only indications from the Commission are that Cost of Service Showings will be costly, time consuming, difficult, will potentially require greater roll-backs than do the Benchmarks, and are discouraged by the Commission.

This is simply not fair. At the very least, the FCC Rate Benchmarks must differentiate between cable operators, by housing and subscriber densities, and by company and system sizes.

Most small operators could be viewed as good entrepreneurs, who risked substantial capital, became liable for extensive debts, and built cable systems in areas that larger companies had consistently declined to serve. Small operators did what Congress hoped the 1984 cable deregulation would do -- brought cable TV to sparsely populated rural areas.

Let me further describe our two companies. The companies are family owned. We started from scratch in 1987, and now serve, between the two companies, 6100 subscribers in six rural townships on the northwestern and southwestern margins of the Detroit metropolitan area.

One company, Televista Communications, serves 2900 customers in Sumpter, Augusta, and York Townships in Southwestern Wayne and Southeastern Washtenaw Counties. The other company, North Oakland Cablevision, 65 miles away, serves 3200 customers in Springfield, Groveland, and Rose Townships in Northwestern Oakland County.

Because these are rural areas, they were historically not deemed serviceable by any of the large MSO's that border our systems. Following cable deregulation, we formed our companies to bring cable to these areas.

The systems average 29 and 31 homes per mile of cable plant in the franchised townships, including trailer parks within the borders

programming than we do, have much greater efficiencies of scale than we do, serve areas of much greater density than we do, and have far higher profit margins than we do.

And yet, the Televista Systems and other small operators are now caught in a snare that Congressional representatives have publicly stated was intended for large MSO's. The Televista Systems are told that we must roll subscription rates back to levels that primarily large MSO's charge in areas (where competition exists) with housing density that is twice the density of the rural areas

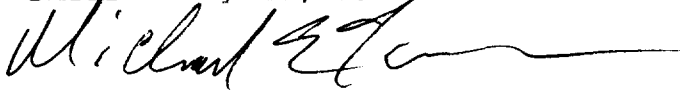
We hope this information and analysis will be of assistance in the development of fair and appropriate Regulations.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Michael E. Turner".

Michael E. Turner
President

DATED: July 29, 1993.

A handwritten signature in cursive script, appearing to read "Michael E. Turner".

ATTACHMENT A -- SUMMARY -- HOMES PER PLANT MILE BY COMPETITION TYPE
 (from FCC Cable TV Rate Survey Database, excluding incomplete data)

COMPETITION TYPE	<u># OF SYSTEMS</u>	<u>HOMES PASSED</u>	<u>PLANT MILES</u>	<u>AVERAGE HOMES PER PLANT MILE (HPM)</u>	<u>% OF TOTAL HOMES</u>
ALL RESPONSES					
- ALL DENSITIES	369	5,220,133	88,904	59	100.00%
- LESS THAN 40 HPM	133	554,615	27,321	20	10.62%
- LESS THAN 30 HPM	84*	254,615	18,865	13	4.88%
TYPE A COMPETI- TION					
- ALL DENSITIES	64	885,979	9,052	98	16.97%
- LESS THAN 40 HPM	28	49,661	1,649	30	.95%
- LESS THAN 30 HPM	17*	15,965	771	21	.31%
TYPE B COMPETI- TION					
- ALL DENSITIES	38	662,845	10,342	64	12.70%

ATTACHMENT B
SUBSCRIBERS PER MILE OF PLANT AND CONSTRUCTION COST PER SUBSCRIBER

**LOW DENSITY SYSTEMS SHOULD BE
PERMITTED TO ADJUST BENCHMARKS**

Systems with an average of less than 30 subscribers per mile should be permitted to adjust their benchmarks upward to account for higher costs. The exact amount of the adjustments should be based on the percentage by which a given system's per subscriber construction costs (per mile) exceed the average per subscriber construction costs for the systems included in the Commission's database. As demonstrated by the attached chart, density has an enormous impact on per subscriber construction costs.

Subscribers Per Mile of Plant and Construction Cost per Subscriber

	\$15,000	\$15,000	\$15,000	\$15,000	\$15,000	\$15,000	Average
Subscribers Per Mile *	10	15	20	25	30	35	37.75
Construction Cost Per Mile	\$1,500	\$1,000	\$750	\$600	\$500	\$429	\$397
Percentage Difference From Average	277.50%	151.67%	88.75%	51.00%	25.83%	7.86%	0.00%
Depreciation Cost Per Mile Per Month **	104	104	104	104	104	104	104
Depreciation Cost Per Mile Per Subscriber Per Month	\$10.42	\$6.94	\$5.21	\$4.17	\$3.47	\$2.98	\$2.76
Percentage Difference From Average	277.50%	151.67%	88.75%	51.00%	25.83%	7.86%	0.00%
Dollar Difference From Average	\$7.66	\$4.19	\$2.45	\$1.41	\$0.71	\$0.22	\$0.00

* 37.75 subscribers per mile is the average from the FCC database.

** Assumes average life of 12 years.

CERTIFICATE OF SERVICE

I, Michael E. Turner, do hereby certify that on July 29, 1993, copies of the forgoing "Reply to Oppositions to Petitions for Reconsideration" were served by First Class Mail, postage prepaid on the following:

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APPENDIX I

**ANALYSIS OF FCC CABLE TV RATE SURVEY DATABASE
SHOWING HOMES PASSED AND SUBSCRIBER DENSITY
BY COMPETITION TYPE**

SUMMARY
DATA SET 1

ALL RESPONSES, INCLUDING INCOMPLETE DATA
ALL RESPONSES, EXCLUDING INCOMPLETE DATA

ANALYSIS OF FCC RATE SURVEY DATA SHOWING HOMES PASSED AND SUBSCRIBER DENSITY PER PLANT MILE BY COMPETITION TYPE		ALL RESPONSES -- ALL DENSITIES (INCLUDING INCOMPLETE DATA)					ALL RESPONSES -- ALL DENSITIES (EXCLUDING INCOMPLETE DATA ("ID"))					
07/27/93		COMPET- ITION TYPE	HOMES PASSED	HOMES SUB- SCRIBING	PLANT # MILES OPERS		HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE HOMES	DENSITY PER PLANT MILE SUBSCR'S	# OPERS
LINE	S1_CABOW	S5_SC4C0	S2_HHPAS	S2_HMSUB	S2_MILES	F	G	H	I	J	K	L
1	***** SUMMARY *****											
2												
3	TOTAL HOMES PASSED, SUBSCRIBERS		5223186	5202536	195669	419	5220133	3083122	88904			369
4	PLANT MILES & OPERATORS											
5												
6	AVG. DENSITY OF HOMES & SUBSCRIBERS									59	35	
7	PER PLANT MILE -- BY COMPET. TYPE											
8	(EXCLUDING INCOMPLETE RESPONSES)											
9												
10	PERCENT OF ALL HOMES PASSED,						100.00%	100.00%				100.0%
11	SUBS. AND OPERS. -- ALL RESPONSES											
12	(EXCLUDING INCOMPLETE RESPONSES)											
13												
14	PERCENT OF HOMES PASSED, SUBS.,						100.00%	100.00%				100.0%
15	AND OPERATORS -- BY COMPET. TYPE											
16	(EXCLUDING INCOMPLETE RESPONSES)											

SUMMARY
DATA SET 2

ALL RESPONSES, LESS THAN 40 HOMES PER MILE
ALL RESPONSES, LESS THAN 30 HOMES PER MILE

ANALYSIS OF FCC RATE SURVEY DATA SHOWING HOMES PASSED AND SUBSCRIBER DENSITY PER PLANT MILE BY COMPETITION TYPE			ALL RESPONSES -- LESS THAN 40 HOMES PER MILE (EXCLUDING INCOMPLETE DATA ("ID"))						ALL RESPONSES -- LESS THAN 30 HOMES PER MILE (EXCLUDING INCOMPLETE DATA ("ID"))						
07/27/93			COMPETITION TYPE	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE		# OPERS	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE		# OPERS
LINE	S1_CABOW	S5_SC4C0		M	N	O	P	Q	R	S	T	U	V	W	X
1	***** SUMMARY *****														
2															
3	TOTAL HOMES PASSED, SUBSCRIBERS			554615	358297	27321			133	254615	175205	18865			84
4	PLANT MILES & OPERATORS														
5															
6	AVG. DENSITY OF HOMES & SUBSCRIBERS						20	13					13	9	
7	PER PLANT MILE -- BY COMPET. TYPE														
8	(EXCLUDING INCOMPLETE RESPONSES)														
9															
10	PERCENT OF ALL HOMES PASSED,			10.62%	11.62%				36.0%	4.88%	5.68%				22.8%
11	SUBS. AND OPERS. -- ALL RESPONSES														
12	(EXCLUDING INCOMPLETE RESPONSES)														
13															
14	PERCENT OF HOMES PASSED, SUBS.,			10.62%	11.62%				36.0%	4.88%	5.68%				22.8%
15	AND OPERATORS -- BY COMPET. TYPE														
16	(EXCLUDING INCOMPLETE RESPONSES)														

SUMMARY
DATA SET 3

TYPE A COMPET., ALL DENSITIES
TYPE A COMPET., LESS THAN 40 HOMES PER MILE

ANALYSIS OF FCC RATE SURVEY DATA SHOWING HOMES PASSED AND SUBSCRIBER DENSITY PER PLANT MILE BY COMPETITION TYPE			TYPE A COMPETITION -- ALL DENSITIES (EXCLUDING INCOMPLETE DATA ("ID"))						TYPE A COMPET. -- LESS THAN 40 HOMES PER PLANT MILE (EXCLUDING INCOMPLETE DATA ("ID"))						
07/27/93			COMPET- ITION TYPE	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE		# OPERS	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE		# OPERS
OPERATOR							HOMES	SUBSCR'S					HOMES	SUBSCR'S	
LINE	S1_CABOW		S5_SC4C0	Y	Z	AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ
1	*****	SUMMARY													
2															
3	TOTAL HOMES PASSED, SUBSCRIBERS			885979	309636	9052			64	49661	25889	1649			28
4	PLANT MILES & OPERATORS														
5															
6	AVG. DENSITY OF HOMES & SUBSCRIBERS						98	34					30	16	
7	PER PLANT MILE -- BY COMPET. TYPE														
8	(EXCLUDING INCOMPLETE RESPONSES)														
9															
10	PERCENT OF ALL HOMES PASSED,			16.97%	10.04%				17.3%	0.95%	0.84%				7.6%
11	SUBS. AND OPERS. -- ALL RESPONSES														
12	(EXCLUDING INCOMPLETE RESPONSES)														
13															
14	PERCENT OF HOMES PASSED, SUBS.,			100.00%	100.00%				100.0%	5.61%	8.36%				43.8%
15	AND OPERATORS -- BY COMPET. TYPE														
16	(EXCLUDING INCOMPLETE RESPONSES)														

SUMMARY
DATA SET 4

TYPE A COMPET., LESS THAN 30 HOMES PER MILE
TYPE B COMPET., ALL DENSITIES

ANALYSIS OF FCC RATE SURVEY DATA SHOWING HOMES PASSED AND SUBSCRIBER DENSITY PER PLANT MILE BY COMPETITION TYPE		TYPE A COMPET. -- LESS THAN 30 HOMES PER PLANT MILE (EXCLUDING INCOMPLETE DATA ("ID"))						TYPE B COMPETITION -- ALL DENSITIES (EXCLUDING INCOMPLETE DATA ("ID"))						
07/27/93		COMPET- ITION TYPE	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE		# OPERS	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE		# OPERS
OPERATOR						HOMES	SUBSCR'S					HOMES	SUBSCR'S	
LINE	S1_CABOW	S5_SC4C0	AK	AL	AM	AN	AO	AP	AQ	AR	AS	AT	AU	AV
1	***** SUMMARY *****													
2														
3	TOTAL HOMES PASSED, SUBSCRIBERS		15965	5847	771			17	662845	379039	10342			38
4	PLANT MILES & OPERATORS													
5														
6	AVG. DENSITY OF HOMES & SUBSCRIBERS					21	8					64	37	
7	PER PLANT MILE -- BY COMPET. TYPE													
8	(EXCLUDING INCOMPLETE RESPONSES)													
9														
10	PERCENT OF ALL HOMES PASSED,		0.31%	0.19%				4.6%	12.70%	12.29%				10.3%
11	SUBS. AND OPERS. -- ALL RESPONSES													
12	(EXCLUDING INCOMPLETE RESPONSES)													
13														
14	PERCENT OF HOMES PASSED, SUBS.,		1.80%	1.89%				26.6%	100.00%	100.00%				100.0%
15	AND OPERATORS -- BY COMPET. TYPE													
16	(EXCLUDING INCOMPLETE RESPONSES)													

SUMMARY
DATA SET 5

TYPE B COMPET., LESS THAN 40 HOMES PER MILE
TYPE B COMPET., LESS THAN 30 HOMES PER MILE

ANALYSIS OF FCC RATE SURVEY DATA
~~OF THE DATA SETS~~

TYPE B COMPET. -- LESS THAN 40 HOMES PER PLANT MILE; TYPE B COMPET. -- LESS THAN 30 HOMES PER PLANT MILE

SUMMARY
DATA SET 6

TYPE C COMPET., ALL DENSITIES
TYPE C COMPET., LESS THAN 40 HOMES PER MILE

ANALYSIS OF FCC RATE SURVEY DATA SHOWING HOMES PASSED AND SUBSCRIBER DENSITY PER PLANT MILE BY COMPETITION TYPE			TYPE C COMPETITION -- ALL DENSITIES (EXCLUDING INCOMPLETE DATA ("ID"))						TYPE C COMPET. -- LESS THAN 40 HOMES PER PLANT MILE (EXCLUDING INCOMPLETE DATA ("ID"))						
07/27/93			COMPET- ITION TYPE	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE HOMES SUBSCR'S	# OPERS	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE HOMES SUBSCR'S	# OPERS		
LINE	OPERATOR		SS_SC4CD	BI	BJ	BK	BL	BM	BN	BO	BP	BQ	BR	BS	BT
1	***** SUMMARY *****														
2															
3	TOTAL HOMES PASSED, SUBSCRIBERS			184519	106125	2955			15	7556	3287	290			1
4	PLANT MILES & OPERATORS														
5															
6	AVG. DENSITY OF HOMES & SUBSCRIBERS						62	36					26	11	
7	PER PLANT MILE -- BY COMPET. TYPE														
8	(EXCLUDING INCOMPLETE RESPONSES)														
9															
10	PERCENT OF ALL HOMES PASSED,			3.53%	3.44%				4.1%	0.14%	0.11%				0.3%
11	SUBS. AND OPERS. -- ALL RESPONSES														
12	(EXCLUDING INCOMPLETE RESPONSES)														
13															
14	PERCENT OF HOMES PASSED, SUBS.,			100.00%	100.00%				100.0%	4.09%	3.10%				6.7%
15	AND OPERATORS -- BY COMPET. TYPE														
16	(EXCLUDING INCOMPLETE RESPONSES)														

SUMMARY
DATA SET 7

TYPE C COMPET., LESS THAN 30 HOMES PER MILE
NO COMPETITION, ALL DENSITIES

ANALYSIS OF FCC RATE SURVEY DATA SHOWING HOMES PASSED AND SUBSCRIBER DENSITY PER PLANT MILE BY COMPETITION TYPE			TYPE C COMPET. -- LESS THAN 30 HOMES PER PLANT MILE (EXCLUDING INCOMPLETE DATA ("ID"))						NO COMPETITION -- ALL DENSITIES (EXCLUDING INCOMPLETE DATA ("ID"))						
07/27/93			COMPET- ITION TYPE	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE		# OPERS	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE		# OPERS
OPERATOR							HOMES	SUBSCR'S					HOMES	SUBSCR'S	
LINE	S1_CABOW		S5_SC4CO	BU	BV	BW	BX	BY	BZ	CA	CB	CC	CD	CE	CF
1	***** SUMMARY *****														
2															
3	TOTAL HOMES PASSED, SUBSCRIBERS			7556	3287	290			1	3485623	2287781	66488			251
4	PLANT MILES & OPERATORS														
5															
6	AVG. DENSITY OF HOMES & SUBSCRIBERS						26	11					52	34	
7	PER PLANT MILE -- BY COMPET. TYPE														
8	(EXCLUDING INCOMPLETE RESPONSES)														
9															
10	PERCENT OF ALL HOMES PASSED,			0.14%	0.11%				0.3%	66.77%	74.20%				68.0%
11	SUBS. AND OPERS. -- ALL RESPONSES														
12	(EXCLUDING INCOMPLETE RESPONSES)														
13															
14	PERCENT OF HOMES PASSED, SUBS.,			4.09%	3.10%				6.7%	100.00%	100.00%				100.0%
15	AND OPERATORS -- BY COMPET. TYPE														
16	(EXCLUDING INCOMPLETE RESPONSES)														

SUMMARY
DATA SET 8

NO COMPETITION, LESS THAN 40 HOMES PER MILE
NO COMPETITION, LESS THAN 30 HOMES PER MILE

ANALYSIS OF FCC RATE SURVEY DATA SHOWING HOMES PASSED AND SUBSCRIBER DENSITY PER PLANT MILE BY COMPETITION TYPE		NO COMPETITION -- LESS THAN 40 HOMES PER PLANT MILE (EXCLUDING INCOMPLETE DATA ("ID"))						NO COMPETITION -- LESS THAN 30 HOMES PER PLANT MILE (EXCLUDING INCOMPLETE DATA ("ID"))						
07/27/93		COMPET- ITION TYPE	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE HOMES SUBSCR'S		# OPERS	HOMES PASSED	HOMES SUB- SCRIBING	PLANT MILES	DENSITY PER PLANT MILE HOMES SUBSCR'S		# OPERS
LINE	S1_CABOW	S5_SC4CD	CG	CH	CI	CJ	CK	CL	CM	CN	CO	CP	CQ	CR
1	***** SUMMARY *****													
2														
3	TOTAL HOMES PASSED, SUBSCRIBERS		471058	314331	24567			97	228455	164978	17648			64
4	PLANT MILES & OPERATORS													
5														
6	AVG. DENSITY OF HOMES & SUBSCRIBERS					19	13					13	9	
7	PER PLANT MILE -- BY COMPET. TYPE													
8	(EXCLUDING INCOMPLETE RESPONSES)													
9														
10	PERCENT OF ALL HOMES PASSED,		9.02%	10.20%				26.3%	4.38%	5.35%				17.3%
11	SUBS. AND OPERS. -- ALL RESPONSES													
12	(EXCLUDING INCOMPLETE RESPONSES)													
13														
14	PERCENT OF HOMES PASSED, SUBS.,		13.51%	13.74%				38.6%	6.55%	7.21%				25.5%
15	AND OPERATORS -- BY COMPET. TYPE													
16	(EXCLUDING INCOMPLETE RESPONSES)													

ANALYSIS OF FCC RATE SURVEY DATA
SHOWING HOMES PASSED AND
SUBSCRIBER DENSITY PER PLANT MILE
BY COMPETITION TYPE

07/27/93

ALL RESPONSES -- ALL DENSITIES

(INCLUDING INCOMPLETE DATA)

ALL RESPONSES -- ALL DENSITIES

(EXCLUDING INCOMPLETE DATA ('ID'))

LINE	OPERATOR	COMPETITION TYPE	HOMES PASSED	HOMES SUBSCRIBING	PLANT MILES	# OPERS	HOMES PASSED	HOMES SUBSCRIBING	PLANT MILES	DENSITY PER PLANT MILE HOMES	DENSITY PER PLANT MILE SUBSCR'S	# OPERS
	S1_CABOW	S5_SC4CO	S2_MHPAS	S2_HHSUB	S2_MILES	F	G	H	I	J	K	L
17	***** DETAIL *****											
18												
19	COMCAST COMMUNICATIONS INC	B	65000	36948	741	1	65000	36948	741	87.7	49.9	1
20	TCI	B	6946	3094	155	1	6946	3094	155	44.8	20.0	1
21	TCI	B	6946	3094	155	1	6946	3094	155	44.8	20.0	1
22	CENTURY ALABAMA CABLE CORP	N	4900	4467	209	1	4900	4467	209	23.4	21.4	1
23	CABLE AMERICA CORPORATION	B	58345	22062	990	1	58345	22062	990	58.9	22.3	1
24	TROY CABLEVISION INC	B	6322	3178	110	1	6322	3178	110	57.5	28.9	1
25	TROY CABLEVISION INC	B	6322	3178	110	1	6322	3178	110	57.5	28.9	1
26	CABLESOUTH INC	NB	2834	2429	107	1	2834	2429	107	26.5	22.7	1
27	VISTA COMMUNICATIONS I INC	N	865	574	22	1	865	574	22	39.3	26.1	1
28	COM-LINK INC	A	349	108	14	1	349	108	14	24.9	7.7	1
29	CABLEVISION SYSTEMS CORP	C	6741	4660	121	1	6741	4660	121	55.7	38.5	1
30	CABLEVISION SYSTEMS CORP	A	6741	4660	121	1	6741	4660	121	55.7	38.5	1
31	DELTA CABLEVISION INC	N	2400	1787	32	1	2400	1787	32	75.0	55.8	1
32	TCI	NB	1257	965	22	1	1257	965	22	57.1	43.9	1
33	FRIENDSHIP CABLE OF ARKANSAS INC	N	827	504	39	1	827	504	39	21.2	12.9	1
34	DOUGLAS COMMUNICATIONS MID-SOUTH LP	A	279	114	10	1	279	114	10	27.9	11.4	1
35	DOUGLAS COMMUNICATIONS MID-SOUTH LP	A	357	107	12	1	357	107	12	29.8	8.9	1
36	DOUGLAS COMMUNICATIONS MID-SOUTH LP	A	265	72	10	1	265	72	10	26.5	7.2	1
37	DOUGLAS COMMUNICATIONS MID SOUTH LP	N	400	223	22	1	400	223	22	18.2	10.1	1
38	TRUMANN ARKANSAS	N	348	175	14	1	348	175	14	24.9	12.5	1
39	PAUL GARDNER P Q GARDNER SHIELDS GAR	A	76	18	2	1	76	18	2	38.0	9.0	1
40	CITY OF PARAGOULD	C	8500	3579	145	1	8500	3579	145	58.6	24.7	1
41	JENY BROWERS	N	1000	600	35	1	1000	600	35	28.6	17.1	1
42	TIMES MIRROR CABLE TELEVISION INC	A	0	0	4732	1	ID	ID	ID	ID	ID	ID
43	TIMES MIRROR CABLE TELEVISION INC	N	64117	30557	632	1	64117	30557	632	101.5	48.3	1
44	TIMES MIRROR CABLE TELEVISION INC	A	64117	30557	632	1	64117	30557	632	101.5	48.3	1
45	INSIGHT COMMUNICATIONS COMPANY L P	A	49692	21259	734	1	49692	21259	734	67.7	29.0	1
46	INSIGHT COMMUNICATIONS COMPANY L P	A	49692	21259	734	1	49692	21259	734	67.7	29.0	1
47	TRIAx CABLE GENERAL PARTNER L P-G P	A	22576	3360	295	1	22576	3360	295	76.5	11.4	1
48	JAMES E DOUCETTE	N	1050	625	28	1	1050	625	28	37.5	22.3	1
49	MITGO CORP & INTERMEDIA PARTNERS A	N	26268	21902	656	1	26268	21902	656	40.0	33.4	1
50	TIMES MIRROR CABLE TELEVISION OF PA	N	45008	27389	566	1	45008	27389	566	79.5	48.4	1
51	VIACOM INTERNATIONAL INC	N	21575	17664	224	1	21575	17664	224	96.3	78.9	1
52	CONTINENTAL CABLEVISION INC	A	0	61666	800	1	ID	ID	ID	ID	ID	ID
53	LENFEST COMMUNICATIONS INC	N	0	67639	769	1	ID	ID	ID	ID	ID	ID
54	AMERICAN CABLE OF REDLANDS JOINT VE	NB	87282	42426	1050	1	87282	42426	1050	83.1	40.4	1